

UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF INDIANA

[This form is for prisoners to sue for civil rights violations. NEATLY print in ink (or type) your answers.]

Kyle Allen Bolton

[You are the **PLAINTIFF**, print your full name on this line.]

v.

State of Indiana

[The **DEFENDANT** is who you are suing. Put ONE name on this line. List ALL defendants below, including this one.]

Case Number 1:22-cv-00228-HAB-SLC

[For a new case in this court, leave blank.
The court will assign a case number.]

[The top of this page is the caption. Everything you file in this case must have the same caption. Once you know your case number, it is VERY IMPORTANT that you include it on everything you send to the court for this case. DO NOT send more than one copy of anything to the court.]

PRISONER COMPLAINT

#	Defendant's Name and Job Title	Work Address
1	[Put the defendant named in the caption in this box.] <u>State of Indiana (prosecutor's office)</u>	<u>602 S Calhoun St, Fort Wayne, IN, 46802</u>
2	[Put the names of any other defendants in these boxes.] <u>Fort Wayne Police Department</u>	<u>E Main St 108, Fort Wayne, IN, 46803</u>
3	<u>EEOC</u> <u>Equal Economic Opportunity Commission</u>	<u>2310 Parnell Ave, Fort Wayne, IN, 46805</u>

[If you are suing more defendants, attach an additional page. Number each defendant. Put the name, job title, and work address of each defendant in a separate box as shown here.]

1. How many defendants are you suing? 6
2. What is the name and address of your prison or jail? Allen County Jail
417 South Calhoun St, Fort Wayne, IN
3. Did the event you are suing about happen there? Yes. No, it happened at: (Both) → EEOC / General Motors / Allen County Court System attached to jail
4. On what date did this event occur? March 2021 to present date (Dec 2022)

[DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]

FILED
At GARY T. BELL, Clerk M
U.S. DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
JAN 06 2023

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PRISONER COMPLAINT

#	Defendant's Name and Job Title	Work Address
1	[Put the defendant named in the caption in this box.] <u>General Motors</u>	<u>12200 Lafayette Center Rd. Roanoke, IN 46783</u>
2	[Put the names of any other defendants in these boxes.] <u>Stratosphere</u>	<u>12808 Stonebridge Rd. Allen County IN 46783</u>
3	<u>The Allen County Court System</u>	<u>715 South Calhoun St Fort Wayne IN 46802</u>

[If you are suing more defendants, attach an additional page. Number each defendant. Put the name, job title, and work address of each defendant in a separate box as shown here.]

1. How many defendants are you suing? _____

2. What is the name and address of your prison or jail?

3. Did the event you are suing about happen there? Yes. No, it happened at: _____

4. On what date did this event occur? _____

[DO NOT write in the margins or on the back of any pages. Attach additional pages if necessary.]

CLAIMS and FACTS

DO: Write a short and plain statement telling what each defendant did wrong.

DO: Use simple English words and sentences.

DO NOT: Quote from cases or statutes, use legal terms, or make legal arguments.

DO: Explain when, where, why, and how each defendant violated your rights.

DO: Include every fact necessary to explain your case and describe your injuries or damages.

DO: Number any documents you attach and refer to them by number in your complaint.

DO NOT: Include social security numbers, dates of birth, or the names of minors.

DO: Use each defendant's name every time you refer to that defendant.

DO: Number your paragraphs. [The first paragraph has been numbered for you.]

1. OK. So hello, Let me explain this again,
And organize it ~~so~~ properly. I need help, Please
remember that this is an amended version
of my original complaint. I removed the
Chris Meyers Civil rights lawyer and the
Public Defender's office from the suit because
in the case of Chris Meyers, it is almost
impossible to prove what happened in addition
to the fact that their role in this is
minimal and pertaining to the Public Defender's
office, the head PD came and met with
me after I confronted them directly and I
am satisfied that my issues were addressed,
However, I ~~so~~ am still going to explain
what happened in this long chain of
racist events and may cite these entities
just so the federal judge can properly
~~comprehend~~ comprehend the absurdity of
my situation in its full entirety and
maybe recognize that I am severely damaged,

Claims and Facts (continued)

aggrieved, frustrated, losing my sanity with the situation and am at extreme risk of becoming homeless, a suicide victim, or an insane person with insane thought patterns who could possibly lose control and become a mass shooter in the future. Literally,

Please appreciate that it is hard to write this stuff and ~~hard about and confine my anger to paper~~ hard to think about it and hard to confine my anger to paper while being denied equality, a lawyer, and proper human care that is a basic necessity to the pursuit of happiness and liberty for all Americans.

So ok. Hello Federal Court. Let's begin-

The State of Indiana is actively maintaining a corrupt social climate that has violated my rights of Equal Opportunity, and Due Process of Law, and this all began and was both systematically and personally enforced because of my skin color. In March of 2021 I was contacted by phone and told I was being fired from GM on a racial basis. The company ignorantly assumed I was a white man. After finding out I was actually black, I was brought back to work, but locked-



CLAIMS and FACTS

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DO: Number your paragraphs. [The first paragraph has been numbered for you.]

was
1. Out of the building and forced to work outside on the trucks as if this were the Jim Crow South. After a solid ~~month~~ month of invidious racism, I confronted HR and permanently fired over race. I filed a complaint with the EEOC and they were also discriminatory and racist. To be blunt, they did not take me seriously as an african american due to my skin color and they had a very detached and lazy attitude concerning the vital job of protecting workers' rights. Eventually, they told me my case was too complex and claimed they were sending me a right to sue letter. (So ok apparently complex racism isn't worth fighting now???) To be blunt again - I am a fucking african american with pale white skin such as an albino. There is nothing complex about this scenario. People just don't want to touch it because it implies reverse racism and that makes them feel uncomfortable. -

Claims and Facts (continued)

which is discriminatory to ME and RACIST)
(Please also note here that I never even received the right to sue letter. This event happened during covid and obviously nobody did their job right.) So anyway, I looked for lawyers and none of them seemed to want to take the case or take me seriously as an african american even though I AM BIOLOGICALLY of sub saharan african descent and the NAACP representative who I called locally just laughed at my case. Apparently this predicament was ~~too~~ just too over the top and goofy for him.

Moving on →

or
may

I am a 6 year army veteran diagnosed with psychosis. Life is hard. In August of 2021 I was charged with Burglary. (Remember that I was fired from GM sometime around April of 2021 and it took about 3 months for the EEOC to return useless results, so of course I did what I felt like I had to do to survive after being severly economically ~~disadvantaged~~ disadvantaged in my own freakin country over race and I am proud of myself for surviving while destabilized even though I grapple with suicide.)

Now, during the suspect interview conducted by Robin L Pfieffer, FWPD #1578, who is obviously-

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- AN AGENT OF THE STATE, the State Agent told me on camera that no lawyer in today's society will take my case and THIS WAS CLEARLY DUE TO MY SKIN COLOR. Again, I am an African American with pale white skin. Her obvious implication and opinion was that in today's society, no legal professional or system of legal professionals wants to take on a case where a person with lighter or whiter skin is accused of racism by a darker or blacker person and ~~they~~ is seeking relief for being damaged or conspired against due to the false ~~allegation~~ allegation. Well ok!!! I can fathom that. After all, we all see what is going on in the Nation via social media and certainly the modern social climate seems to be this way, however Robin L Pfieffer is an agent of the state and she told me this while on duty serving an active role for the state, so her opinion here is NOT PROTECTED BY FREE SPEECH IN TERMS of a lawsuit and -

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- I was directly effected and damaged negatively by it. To emphasize, I was discriminated against and impacted economically for having white skin, then after ~~searching~~ searching for legal aid and being prejudiced there over my skin color so I got no help, I committed AN ECONOMIC CRIME and ~~the~~ now the AGENT OF THE STATE who is investigating me has INFORMED ME that I am NOT and WILL NOT RECEIVE ANY LEGAL AID in today's society due to my skin color which contradicts and violates and makes hypocritical the entire concept of EQUAL PROTECTION IN THE FIRST PLACE!!!

Well ok! Now by this point, I just wanted to kill ~~myself~~ myself or commit a mass shooting. But I didn't. However let me be blunt here ~~again~~ again - I WOULD NOT HAVE COMMITTED AN ECONOMIC CRIME had I not been DISADVANTAGED ECONOMICALLY!!! And I would not be tempted to ~~be~~ kill -

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- myself or become a mass shooter if I was not in severe distress over racism, something I am supposed to be protected federally against as a basic fundamental right of being a U.S citizen!!! And I SERVED to help defend this right as an infantryman in the Army!!!!

(Please use this for research)

Now let me emphasize this next point so that we are clear and the FWPD cannot possibly deny the context of the discussion between me and the state agent - Robin D'Fieffer (the state agent), knows I am african american. Furthermore, she knows my dark-skinned african american grandpa because he is a local 20 year police force veteran who managed ~~the~~ the supply room and he is so prominent that he was also on the local news. (His name is Henry Bolton) In fact, she even said she knew him ~~as~~ as soon as she walked into the room ~

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- Prior to conducting the burglary interview, * Please note here that this part of our conversation was subsequently redacted or committed out of my discovery video tapes, albeit the part where she pointed out that I do not have Equal Protection of Law in today's society is still there. (Like magic it popped back up after I became ~~the~~ livid with my PDI-public defender investigator over what seemed to be an organized conspiracy to prevent me from reviewing this on video tape.) And also - to further clarify, Robin Pfieffer, agent of the state, can clearly see both a Henry Bolton and a James Bolton on my Bond Paperwork which is sitting on the table right in between us. Henry Bolton is AFRICAN AMERICAN. James Bolton is AFRICAN AMERICAN. I, Kyle Bolton, am AFRICAN AMERICAN. James Bolton is my brother. Our father, Allen Bolton is AFRICAN AMERICAN. The Henry Bolton on this-

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- Paperwork is my uncle, he is the son of the Henry Bolton who the police detective knows personally, and she even clarified that with me on camera.

So there is NO MISTAKING CONTEXT HERE! She, the State agent, knowingly informed me that I have NO EQUAL Protection of Law in today's society because my skin is white even though I am African American which blatantly violates the entire purpose of belonging to a protected class in the first place.

To be BLUNT AGAIN here, being of white skin color, should not violate my status as a protected class, although a HUGE NUMBER of people in today's Society seem to think so, including the State Agent.

Depriving someone of the Equal Protection for their class because of their skin color

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- is both hypocritical and racist and equivalent to psychological torture and it undermines the entire purpose of protected classes in the first place.

So ok! I'm also going to mention here that clearly listed on the top of the discovery material of the criminal charge that Robin Pfeiffer had me review, and she wrote herself, it says within the first 2 lines that (A) I, Kyle Bolton, am accurately described as a black/african american male and (B) the witness described the "suspect" as a white male.

Characteristics

Please, use simple math and put 2 and 2 together here. ME BEING MISTAKEN FOR + ASSOCIATED with the color
→ characteristics of a white male is so common place that it happens to me on a regular basis and people mention or ask about or make comments about my race ~~or~~ almost every single day!!! So of ~~course~~ course I -

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- am tormented and livid. And I feel like it is common sense that I am not lying about what happened at GM.

So anyways, I feel like at this point the state agent knew she did something psychologically distressing and bad because she got all nervous. When you get the actual tape (federal court) carefully scrutinize her tone and body language when she asks if I am "mixed." It just isn't right.

Draw Conclusions based off logic.

To me, her "professional opinion" as an agent of the State ~~constituted~~ constituted a single act of invidious racism in a long chain of blatant pattern discrimination and it clearly reveals the ~~the~~ corrupt social climate that I live in. I was permanently scarred by this remark and can articulately illustrate the damage.

Now, moving on further, just stick

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- With me → While on bond for the burglary, I met with Mrs. Ilene Smith from Chris Meyers. I needed to discuss my civil rights issues with her because she is the representative for the local civil rights law firm.

(Here you can see that I am still trying to get help, even at this low point.)

Upon the eve of the meeting, Mrs. Ilene Smith makes a racial remark to me stating that "I am not albino", "I am actually mixed", which is very much misleading, but she said it because I had to emphasize that I am quite de facto albino just ~~to~~ to get the interview in the first place!!! And to make matters worse, she sounded disappointed when she told me that I am mixed.

Since this meeting, Chris Meyers has rejected my ~~case~~ due to racially discriminatory reasons, as previously revealed by the State Detective, Robin Pfieffer:-

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- So imagine my fury! Prior to meeting the State agent I felt like I was being discriminated against due to my skin color when it came to securing legal aid for my Equal Economic Opportunity Rights, then when I met ~~her~~ her I was informed that I was indeed being discriminated against while she was supposed to be interviewing me about an economic crime, and then subsequently after meeting her I encountered obvious racism again from a law firm while trying to get ~~the~~ help instead of just going insane and killing a bunch of people at GM in a mass shooting.

So just know here, that I am trying to do this the right way and ~~after~~ ~~after~~ after meeting with Mrs. Ilene Smith, ~~or~~ I stood on top of a downtown parking garage upon the ledge in front of my car and thought about jumping off to kill myself.

Moving on again → During this time, General Motors booked me up and filed a -

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- restraining order against me with the direct intent to get me put in jail in order to silence me since I was speaking out against their racist act online which was garnering attention and they also did this to prevent me from pursuing proper legal litigation on my behalf.

Then, while at civil court, I was lied to by Magistrate Brian Cook and ambushed by ignorant police right in front of the racist GM lawyer. To clarify again - he told me that I was not in trouble if I let GM keep the restraining order, and that allowing them to keep it was not equivalent to me stating that I had ever made any threats.

So why was I being arrested for bond revocation? And why did I receive a pink paper afterward stating that "GM" proved by "clear and convincing evidence" that I had made threats?

To be clear here, this matter was -

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- never directly addressed. Instead, I was charged with resisting arrest when they arrested me despite the fact that the original arrest was made based off no valid bond violation or underlying criminal charge. I know that they were attempting to violate my right of Free Speech in order to revoke my bond, however the State covered that up by filing a second petition to revoke my bond for the resisting arrest charge and never addressed the original reason why they attacked me in the first place.

To be clear here - I have a right of Free Speech as guaranteed to me by the American Constitution and I can healthily exercise that right to inform people that I am psychologically ill over traumatic racism and am having dark thoughts of suicide and mass murder as a symptom. This is me trying to seek help instead of just catching everyone ✓

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- off guard and snapping like this
is Sandy Hook or some other morbid
disaster zone.

And to be further clear- at this point I had already been heavily discriminated against at work, in the legal process, and was informed by a state agent that I basically have no Equal Protection of law so of course I would be livid in a court room where I am being exposed to the very Originator of the problem; "GM", a Company that fired me over my skin color, and now I am getting arrested in a police set up ambush over the allegations they made with the direct intent to get me arrested.

I also ~~must~~ must add this here, that in the restraining order, prior to court, GM taunted me and insulted me by listing my race as "identifies as black" as if I am not a real valid black african american person -

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- and my rightful claim as such is being grouped with the same sort of skepticism that people apply to transsexuals with sex changes to the opposite gender.

So yeah, forgive me for resisting arrest ~~after~~ after all the racist psychological torture I was put through. NO AFRICAN AMERICAN PERSON PUT THROUGH THIS WOULDVE EVER FELT OK inside that court room. If you think so, or think I had an obligation to be civil, when I obviously could see that it was a racist set up, you are delusional and oftentimes I feel like I shouldve shown up with a gun and fought for my rights to the death against that judge, that company, ~~and~~ ~~those~~ and those cops.

This event disturbed me. It shouldve been common sense to the local legal system to mediate this somehow.

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- Please note that the official case number for this racist event is 02DOL-2111-P0-003315.

on -

Now, moving again, just stick with me, and appreciate the fact that it hurts to write this stuff, and please just appreciate and recognize that it is taking all my self control to hold back ~~the deep~~ the deep homicidal anger here — since coming to jail I have become the target of both an ~~unfairly~~ unfairly corrupted Due Process system and a malicious prosecution. And it is NOT far-fetched to say this also has something to do with GM ~~a~~, a major ~~a~~ corporation in this region that holds a lot of power and influence in addition to my race, which is black, that makes me vulnerable in a criminal justice system which has traditionally been dominated by unsympathetic or empathetic whites who are ~~ignorant~~ ignorant of the realities of the afrocentric —

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- urban struggle and most likely ~~are~~ are at least partly biased due to racism themselves.

So OK. Let's get started on this portion. First of ~~all~~ all this jail itself has been deemed ~~to violate~~ to structurally violate the American Constitution and certain confinement issues here have breached the 8th Amendment, cruel and unusual punishment standard. This is not my opinion. It is a fact that is regularly reported in the newspaper and the jail is currently under federal injunction. My goal here however is not to further attack the integrity of the jail or file an untruthful, inaccurate, misleading, exaggerated, or frivolous complaint, and thus I have not cited the jail as a defendant and I will not elaborate on the conditions here albeit I will acknowledge that I believe these circumstances loop into damaging the integrity of the Due Process system and I wish to point out that the entire court system in -

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- this county is just as bad and constitutionally unacceptable as the jail. (In terms of structure.)

I am going to streamline this portion of events to make it ~~as~~ easy to comprehend although I could go on and on about this for a solid 20 pages.

For one, the prosecutors here have too much power to charge us with anything or overcharge us with a crime and they are abusing the numbered level system.

Furthermore the judges and the plea deals are not correctly applying mitigating factors to cases in addition to erroneously piling on aggravators and there is seemingly an extreme bias in the racial spectrum when it comes to the sentencing of defendants. (African American suspects seem to be getting handed harsher sentences for crimes.) Also, we are blatantly ~~as~~ being punished just for going to trial here -

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- and I can prove it. This is not just a perception though or a baseless accusation. It is palpable. So palpable that every pre-trial detainee here actively fears it.

Now, in my case in particular, I was granted 2 public defenders - one for the felony burglary and another for the misdemeanor resisting arrest.

Please remember that I was already informed at this point by the state agent that I would be actively prejudiced in the legal field due to my skin color, so ~~this~~ by this time I had a vibrant skepticism of my court-mandated lawyers and this remark by the state agent rolled over to make it hard for me to work with my PDs which also effected my Due Process.

felony

Seemingly (seemingly) neither of my PDs, Jaime Egolf for the ~~misdemeanor~~, and ~~Karen~~ Lierin Russman for the misdemeanor, respected me as an African American -

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- They also seemed scared of me and my case and ~~the~~ ~~the~~ seemed not to exist to protect my interests, but to extort me or exert the will of the prosecutor. Please note here that these aforementioned issues are just perceptions. What I have come to learn is that the truth is the prosecutors have too much leverage in this County, the PD system is a paper defense, and yes, my racial issue is like a double-edged sword that makes people uncomfortable here and speaking about it to the court is like some sort of taboo.

To be clear here however, neither of my lawyers made any moves to confront the blatant racism in my cases and they did not collect exculpatory evidence that was material to my Insanity defense and had to do with both my civil rights predicament, my medical diagnosis, and my race.

Yes. After doing my own research here in the Law Library, I decided to ~~the~~ -

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- pursue an Insanity Defense because it applied directly to my situations, ESPECIALLY THE MISDEMEANOR.

And I honestly feel like I was prejudiced out of this defense due to my race / skin color in addition to the psychiatrists having ulterior motives. Notably, the Insanity screening system is moving lack an illegal racket, the people working for this country are blatantly trying to confuse suspects into thinking that legal insanity and incompetency are the same things when they are not. Irritably enough, the insanity and competency screening are merged together and the psychiatrists are getting paid by the court system which turns the process into a lucrative conveyor belt for them and provides a conflict of interests because the psychiatrists feel cozy collecting a paycheck while telling the courts exactly what they want to here, that suspects are just fine and not insane so that they can keep the business -

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- going. Overall, this aspect of my experience, getting screened for Insanity, seemed like a placebo pill, something the court used just to mark on paper that they did their job since I am an army veteran with psychosis. Now, one of the idiot psychiatrists who seemed offended by my racial torment felt the need to tell me that "people can discriminate against people of their own race" in order to validate the ~~racist~~ motive behind my GM job termination. I'm not even going to elaborate on that though. Just know that it infuriates me and I'm not gonna keep tolerating this torture.

Yet here I want to note something special happened. Prior to meeting the psychiatrists, we had ~~a~~ ~~psychiatric screening~~, a competency hearing in court even though I did not ask for one. And at that hearing, I was thrown down and punched ~~twice~~ twice by the cops in front ~~of~~ of everyone ~~of~~, including my -



(will ~~soon~~ start double ~~copy~~
siding these to save space) /ND case 1:22-cv-00228-HAB-SJF document 17

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- Court appointed public defender, when I decided to confront the prosecutor about the absurdity and racism going on in my case.

But nevermind the assault! Pay attention here. All the audio is recorded on record. Allen County holds multiple hearings simultaneously for different defendants in the same court room. So at this event, one of my cellmates from the 6 man cell, Lanell Ayers, who is also african american, was getting sentenced for a Level 4 crime after being found guilty at trial.

During his time to speak he apologized for going to trial right in front of Judge Zent. Remember how I told you that getting punished for going to trial is so common place here that the fear is palpable? (This will come into play later)

Forgive me I spaced out for several moments here in dark rumination and fathomless melancholy. Prepare for double sided pages. →

- Now, ~~so~~ a big part of why I confronted the prosecutor here was to prevent him from shifting the unreasonable burden of trial dates moving onto me over the excuse of psychological screening. This has to do with a little known aspect of law known as Criminal Rule 4C. Basically the state only has a certain amount of time to detain each suspect before a trial before they legally have to let them go. This is pertinent to me because at a prior hearing Judge Zent claimed he could not be present on my trial dates and suggested that another judge might fill in combined with the fact that Allen County was backlogged at this time with court cases so literally everyone's trial dates were getting pushed back. So it was not unfeasable for me to believe that my trial would've been delayed anyway regardless of the psyche screening and when it was the prosecutor's turn to speak and he told the court "The State is frustrated, we are pre-for trial" it was obvious to me what he was doing (shifting the burden of trial moving onto me) and so -